

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION  
Case No. 7:23-cv-897

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| IN RE:                                 | ) | <b>NOTICE IN RESPONSE<br/>TO THE COURT'S SETTLEMENT<br/>MASTERS ENGAGEMENT ORDER OF<br/>AUGUST 6, 2024</b> |
|  | ) |  |
| CAMP LEJEUNE WATER LITIGATION          | ) |  |
|  | ) |  |
| This Document Relates To:<br>ALL CASES | ) |  |
|  | ) |  |

The United States respectfully provides this Notice in Response to the Court's Settlement Masters Engagement Order of August 6, 2024. D.E. 268. Since the entry of the Order, the United States and the Settlement Masters have continued to engage in constructive conversations, and the United States has addressed a significant number of the Settlement Masters' concerns, moving the United States and the Settlement Masters closer to an agreement that will allow the United States to pay for the Settlement Masters' work. The United States is eager to start working with the Settlement Masters but is mindful that the Court stated that the Settlement Masters' appointment is "conditioned on the PLG and the Defendant entering into contracts for the payment of Mr. Perrelli and Mr. Oprison as Settlement Masters." D.E. 251 at 1.

The most significant remaining issue involves ensuring the protection of government information, which is of paramount importance to the United States particularly where it concerns personally identifiable information that is in the United States' possession. The United States and the Settlement Masters are in continued discussions regarding how to address this issue and are optimistic that they can reach an accommodation very soon. Communications between the Settlement Masters and the United States have referenced the language in the Court's appointment order stating that "[t]o the extent that the Settlement Masters and their associates need to access

Department of Justice data, the Settlement Masters shall use equipment provided by the Department of Justice to secure access. The Settlement Masters shall follow the standard Department of Justice rules of behavior for this equipment.” D.E. 251 at 6. The Settlement Masters and the United States are continuing to address the types of litigation information that would require the use of Department of Justice equipment.

Dated: August 12, 2024

Sincerely,

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General  
Civil Division

J. PATRICK GLYNN  
Director, Torts Branch

BRIDGET BAILEY LIPSCOMB  
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s/ Adam Bain  
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**CERTIFICATE OF SERVICE**

I hereby certify that on August 12, 2024, the foregoing was served on counsel of record via electronic mail.

/s/ Adam Bain  
ADAM BAIN  
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U.S. Department of Justice